

Exhibit "A"

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UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

NATIONAL LIABILITY & FIRE INSURANCE CO.

and

BOAT OWNERS ASSOCIATION OF THE
UNITED STATES

: Civil Action No: 17-0038-S-PAS

Plaintiffs,

: In Admiralty

v.

NATHAN CARMAN

Defendant.

PLAINTIFFS' INITIAL DISCLOSURE

Plaintiffs/counterclaim defendants NATIONAL LIABILITY & FIRE INSURANCE COMPANY ("NLFIC") and BOAT OWNERS ASSOCIATION OF THE UNITED STATES ("BoatU.S."), by and through their attorneys provide this initial disclosure in accordance with Fed. R. Civ. P. 26(a)(1)(A), without waiver of the attorney-client privilege or the work product discovery protection:

Individuals with Discoverable Information

Nathan Carman

Subject: Loss of insured boat, death of Mother, Examination Under Oath

Brian Woods
1 Jason's Hill Lane
Kingston, MA 02364
(781) 771-9358

Subject: CHICKEN POX sale condition and appurtenances

730- Chris Doyle
554- Misty Dowling
507- Karen Williams
551- Tawanda Bridgeforth
196- Valeria Hernandez
528- Wanda Cooper
198- Torrey Evans
TT- Tamrat Tadesse
580- Stevie Owsoski
165- Muta Rwegasira
593- Brandy Sandoval
167- Sherry Coleman
507- Karen Williams
VN- Vy Nguyen
KL- Kim Nguyen
198, TOEV- Torrey Evans
RT- Roxana Torres
191- Erika Huggins
450- Shantelle Rubio Reyes
BKE- Barbara Eller
170- Jorge Martinez
KELO- Kendrell Longshore
Brian Yaeger
c/o BoatU.S. Marine Insurance Program

Subject: BoatU.S. employee contact by telephone or email with Nathan Carman,
as reflected in Old Memo Screens and Memo Screens

Bernard J. Feeney
197 Pleasant Street
Whitman, MA 02382
(617) 823-2936

Subject: December 9, 2015 Report of Marine Survey

Richard J. Grandinetta
c/o BoatU.S. Marine Insurance Program

Subject: December 21, 2015 letter to Nathan Carman
12/21/2015 Marine Insurance Binder

Kimberly Shaw
c/o BoatU.S.

Subject: 12/22/2015 Boat U.S. YACHT POLICY Declarations Page

Mike Pellerin, Vice President Underwriting
c/o BoatU.S. Marine Insurance Program

Subject: 12/23/2015 letter to Nathan Carman
03/25/2016 Certificate of Insurance for Ram Point Marina

Beverlie Spencer
c/o BoatU.S. Marine Insurance Program

Subject: Nathan Carman's engine Claim No. 1602366

Dexter A. Holaday II
P.O. Box 9201
Noank, CT 06340
(860) 536 8573

Subject: Investigated Nathan Carman's engine claim and sinking claim

Sharon Hartstein
c/o Attorney Brian Spears
Spears Manning LLC
2425 Post Road, Suite 303
Southport, CT 06890
(203) 292-9766

Subject: September 17-18, 2016 fishing trip plan

Michael and Deanna Niejadlik
c/o Ram Point Marina
(860) 428-9598

Subject: Nathan Carman's September 17, 2016 boat work

Mike Iozzi
165 Hill Top Road
Cumberland, RI 02864
(401) 334-3068

Subject: Nathan Carman's September 17, 2016 removal of trim tabs

Martha Charlesworth, AIC
c/o BoatU.S. Marine Insurance Program

Subject: Nathan Carman's sinking Claim No. 1607671

Attorney Hubert J. Santos
51 Russ Street
Hartford, CT 06106-1566
(860) 724-6548

Subject: October 12, 2016 letter to Attorneys Nardini and Boyle
Nathan Carman's Examination Under Oath
December 30, 2016 letter to Attorney Farrell

Documents

CHICKEN POX video before sale to Nathan Carman
<https://m.youtube.com/watch?v=IMYsuzyXbwI>

CHICKEN POX photo before sale to Nathan Carman

BoatU.S. Marine Insurance Program website pages, November-December 2015

BoatU.S. Old Memo Screen notes, ##1 - 29

BoatU.S. Memo Screen notes, ##1 - 5

Bernard J. Feeney Report of Marine Survey, December 09, 2015, approved 12/21/2015

BoatU.S. Insurance Quotation, ECF No. 12-1

Marine Insurance Binder, ECF No. 12-3

Mike Pellerin 12/23/2015 letter to Nathan Carman and enclosures including Declarations page and Yacht Policy No. 3985989-15 booklet

Sherry L. Coleman January 22, 2016 letter to Nathan Carman

BoatUS Insurance February 17, 2016 email to Nathan Carman and attachments

Nathan Carman February 19, 2016 email and attachments including Recommendations Reply Form and Marine Insurance Application

Application for Initial Vessel Certificate of Title, 24 Feb. 2016

State of Rhode Island and Providence Plantations Vessel Certificate of Title, 02/24/16

Certificate of Marine Insurance, Ram Point Marina, 3/25/2016

Beverlie Spencer April 28, 2016 certified letter to Nathan Carman and signed receipt

Engine Claim No. 1602366 memos

Dexter A. Holaday II 29 April 2016 Photo Report

Beverlie Spencer May 24, 2016 letter to Nathan Carman

Beverlie Spencer September 2, 2016 letter to Nathan Carman

BoatU.S. FIRST REPORT – Sinking

Sinking Claim No. 1607671 memos (Attorney-Client communications redacted)

Martha Charlesworth, AIC October 12, 2016 emailed letter to Nathan Carman

Dexter A. Holaday II 31 October 2016 Loss Report

Martha Charlesworth, AIC November 11, 2016 emailed letter to Nathan Carman

November 29, 2016 telephone memo and email to Nathan Carman with attached Declarations Page, Endorsement, and Yacht Policy No. 3985989-15 booklet

December 16, 2016 Examination Under Oath transcript and exhibits

Attorney Santos December 30, 2016 letter to Attorney Farrell

Martha Charlesworth, AIC January 27, 2017 emailed letter to Nathan Carman and attached Eric Greene and Michael McCook letters, ECF No. 1-1

ABC 20/20 “Lost at Sea” episode, outtakes

Damages

N/A besides plaintiffs' attorneys' fees and costs

Insurance Agreement

Policy No. 3985989-15: 12/22/2015 Declarations Page

Yacht Policy

Endorsements E948, A101, A105, VT 96

03/28/2016 Endorsement

Dated: June 15, 2017

Respectfully submitted,

/s/ David J. Farrell, Jr.
David J. Farrell, Jr.
Pro Hac Vice
Liam T. O'Connell
Pro Hac Vice
Farrell McAleer & Smith LLP
2355 Main Street, P.O. Box 186
South Chatham, MA 02659
508.432.2121 x 15
sealaw@live.com

/s/ Sean T. O'Leary
Sean T. O'Leary (#6035)
O'Leary Law Associates
4060 Post Road
Warwick, Rhode Island 02886
401.615.8584 Office
sto@olearylaw.com

Certificate of Service

I Priority Mailed a copy of this initial disclosure and a CD with documents stamped P001 – P00424 to Atty Anderson and emailed a copy of this initial disclosure to him and Atty Humphrey 06/15/2017.

/s/ David J. Farrell, Jr.